

Reply Strazzeri Declaration Exhibit 1

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KEISHA JONES,

Plaintiff,

Civil Action No.

-against-

11CV9136 (CM) (KNF)

EQUIFAX, INC., EXPERIAN INFORMATION
SOLUTIONS, INC., TRANS UNION, LLC,
BILATERAL CREDIT CORP., LLC,
HAHNEMANN UNIVERSITY HOSPITAL,
CENTRAL FINANCIAL CONTROL,
COMCAST CABLE,

Defendants.

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January 10, 2013
9:55 a.m.

Videotaped Deposition of KEISHA JONES,
taken by Defendants, pursuant to Notice, at the
offices of Jones Day, 222 East 41st Street, New
York, New York, before William Visconti, a
Shorthand Reporter and Notary Public within and
for the State of New York.

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18 ALSO PRESENT:

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JONATHAN POPHAM, Videographer

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18:21:46 2 you identify?

18:21:47 3 A. Credit accounts -- between -- prior
18:21:52 4 to the Security Freeze Law going into effect which
18:21:56 5 is November, 2006, I was disputing -- I disputed
18:22:01 6 at least I recall one credit account. A credit
18:22:05 7 account was opened. I discovered that a bank
18:22:10 8 account was opened at Commerce Bank in
18:22:15 9 Pennsylvania. Addresses have been ongoing.
18:22:22 10 Philadelphia Gas Works.

18:22:26 11 Q. I'm looking specifically at
18:22:29 12 paragraph ten of your complaint.

18:22:32 13 MR. MALLON: The first amended
18:22:33 14 complaint?

18:22:33 15 MR. KARAMOUZIS: Amended complaint,
18:22:35 16 right, Exhibit 18.

18:22:36 17 Q. Paragraph ten reads, "After
18:22:39 18 experiencing identity theft at every level,
18:22:42 19 medical, employment, criminal, (with some
18:22:49 20 examples) and financial." Do you see that?

18:22:50 21 A. Yes.

18:22:53 22 Q. And you list the Pennsylvania DMV,
18:22:56 23 tax fraud via H&R Block, bank fraud via
18:23:03 24 Pennsylvania based Commerce Bank presently TD
18:23:07 25 Bank. Do you see all of those examples?

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18:23:09 2 A. Yes.

18:23:11 3 Q. Are there any other instances of
18:23:15 4 identity theft that are not listed here in your
18:23:17 5 complaint?

18:23:17 6 A. That pretty much falls under those
18:23:22 7 categories, fraudulent medical bills, fraudulent
18:23:25 8 wage, I put criminal, I consider getting
18:23:28 9 credentials from DMV to be criminal, maybe it is
18:23:32 10 not criminal. Tax fraud I do believe that is
18:23:35 11 criminal. Bank fraud. The utilities, phones,
18:23:39 12 addresses, aliases.

18:23:44 13 Q. Almost anything that you could
18:23:46 14 think of. The only Defendants in this lawsuit
18:23:54 15 were the three credit reporting agencies, my
18:23:56 16 client and Hahnemann and Central Financial, right?

18:23:59 17 MR. MALLON: Objection, the complaint
18:24:01 18 speaks for itself. You can answer.

18:24:03 19 A. Correct.

18:24:03 20 Q. I will rephrase. Did you ever
18:24:07 21 consider suing anyone else besides the Defendants
18:24:09 22 that you name in this lawsuit?

18:24:09 23 A. There was a consideration to sue
18:24:12 24 others.

18:24:12 25 Q. Who were the others that you